

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

AMANDA HEAD,

Plaintiff,

Case No. 24-cv-11818

v.

Hon. Mark A. Goldsmith

OXFORD RECOVERY CENTER,

Defendant.

Noah S. Hurwitz (P74063)

Brendan J. Childress (P85638)

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PLAINTIFF’S NOTICE OF SUPPLEMENTAL INFORMATION

Plaintiff Amanda Head (“Plaintiff”), by and through her attorneys, Hurwitz Law PLLC, hereby submits this notice of supplemental information, which Plaintiff contends disproves ECF No. 13-2 (Exhibit Declaration). On October 24, 2024 Defendant filed their Response (ECF No. 13) to Plaintiff’s Motion to Dismiss and Impose Sanctions (ECF No. 12). Attached to Defendant’s response brief was a “declaration of Tami Peterson” (ECF No. 13-2). Ms. Peterson is the CEO and owner of the Oxford Recovery Center. *Id.* at PageID.221, ¶1. Ms. Peterson claims that she

“reviewed [Plaintiff’s] time records” and further claimed that “Head attempted to use her position as an employee to impermissibly eliminate her debt to Oxford for services provided to her son.” *Id.* at PageID.222, ¶8, 10. Ms. Peterson’s allegations against Ms. Head are ostensibly false. On Monday March 10, 2025 Tami Peterson was arrested at her home in connection with a January 31, 2025 hyperbaric chamber explosion that killed a five-year-old child who was inside.¹ Ms. Peterson has been charged with second-degree murder and manslaughter for her connection to the incident. On top of Ms. Peterson’s own personal legal woes, two other individuals employed by Defendant are facing identical charges and one individual is being charged with *falsifying medical records*. *Id.*

As this court is aware, this is not the first time that an individual employed by Oxford has been charged or convicted with crimes involving dishonesty. On December 3, 2024 Kimberly Casey Coden[-Diskin] was sentenced by the 44th Circuit Court in Livingston County, Michigan for “multiple felonies related to impersonating a health care professional and witness intimidation.”² Ms. Coden was sentenced to 4-6 years’ incarceration for six counts of Unauthorized Practice of a Health Profession; 4-7.5 years’ incarceration for two counts of Identity Theft; and

¹ Hyperbaric chamber explosion: Owner of Oxford Center arrested in 5-year-old boy's death | FOX 2 Detroit

² <https://www.michigan.gov/ag/news/press-releases/2024/12/03/oakland-county-woman-sentenced-to-prison-for-posing-as-health-professional-witness-intimidation>

4-6 years' incarceration for one count of Bribing, Intimidating a Witness. *Id.* Michigan's Attorney General, Dana Nessel, informed the public that Coden was employed as a director of services at Oxford Recovery Center.

It is well established that "any evidence of prior criminal convictions is admissible regardless of punishment 'if it readily can be determined that establishing the elements of the crime required proof or admission of an act of dishonesty or false statement by the witness.'" *Morrison v. Stephenson*, No. 2:06-CV-283, 2008 WL 618778, at *1 (S.D. Ohio Mar. 3, 2008); Fed.R.Evid. 609(a)(2). Further, "[t]he 1990 Advisory Committee notes to the Rule clarify that 'dishonesty and false statement' include crimes such as perjury, subornation of perjury, *false statement*, *criminal fraud*, embezzlement, false pretense, or any other offense in the nature of *crimen falsi*, commission of which involves some element of deceit, untruthfulness, or falsification bearing on the accused's propensity to testify truthfully." *Morrison*, No. 2:06-CV-283 at *1 (S.D. Ohio Mar. 3, 2008).

Because of the serious allegations and prior convictions levied against Ms. Peterson and her staff, which are troubling to say the least, Plaintiff requests that this Court give little to no weight to Ms. Peterson's declaration, dismiss Defendant's counterclaims, and impose sanctions upon Defendant for filing groundless and false allegations against Plaintiff.

Respectfully submitted,

HURWITZ LAW PLLC

/s/ Noah S. Hurwitz

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Date: March 11, 2025

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing was served upon the attorneys(s) of record for all parties by submitting the document through the ECF filing system on March 11, 2025.

/s/ Noah S. Hurwitz
Noah S. Hurwitz (P74063)